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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
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13 INTEL CORPORATION and APPLE INC.,

14 Plaintiffs,

15 v.

16 FORTRESS INVESTMENT GROUP LLC,  
17 FORTRESS CREDIT CO. LLC, UNILOC  
18 2017 LLC, UNILOC USA, INC., UNILOC  
19 LUXEMBOURG S.A.R.L., VLSI  
20 TECHNOLOGY LLC, INVT SPE LLC,  
21 INVENTERGY GLOBAL, INC., IXI IP, LLC,  
22 and SEVEN NETWORKS, LLC,

23 Defendants.  
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Case No. 3:19-cv-07651-EMC

**STIPULATION AND [PROPOSED]  
ORDER SETTING PAGE LIMITS FOR  
MOTION TO DISMISS AND STRIKE  
BRIEFING**

Pursuant to Civil Local Rule 7-12, plaintiffs Intel Corporation and Apple Inc. (collectively, “Plaintiffs”) and defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, Uniloc 2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.a.r.l., VLSI Technology LLC, Inventergy Global, Inc., INVT SPE LLC, IXI IP, LLC, and Seven Networks, LLC (collectively, “Defendants”) by and through their undersigned counsel hereby stipulate as follows:

WHEREAS, on August 4, 2020, Plaintiffs filed a 132-page Amended Complaint (“AC”) asserting claims for violation of Section 1 of the Sherman Act, Section 7 of the Clayton Act, and Section 17200 of the California Business and Professions Code (Dkt. 192);

WHEREAS, Defendants intend to file motions to dismiss and strike Plaintiffs’ AC in accordance with the Court’s order approving an extended briefing schedule (Dkt. 196) and seek to coordinate their motion practice in order to reduce redundancy and total pages submitted to the Court;

WHEREAS, the parties have agreed, subject to Court approval, that: (i) all Defendants collectively will be entitled to 40 total pages for their motions to dismiss and strike moving briefs, which will likely be filed in a single joint brief, (ii) both Plaintiffs collectively will be entitled to 40 total pages for their oppositions, and (iii) all Defendants collectively will be entitled to 24 total pages for their replies. Should Defendants respond by way of multiple motions, the parties have further agreed that they may allocate the pages for their respective motions, oppositions, and replies however they choose;

WHEREAS, absent this stipulation, each Defendant would be entitled to file a motion to dismiss and strike of up to 25 pages, and Plaintiffs would be entitled 25 pages to oppose each such motion (L.R. 7-2, 7-3), which would result in potentially hundreds of pages of briefing on the motions to dismiss and strike;

WHEREAS, the requested page limits herein will allow the parties to coordinate their collective briefing and more efficiently present the motion to dismiss and strike issues to the Court;

IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the Court’s approval:

1. Defendants may have 40 pages collectively for their motions to dismiss and strike Plaintiffs' AC to be allocated amongst Defendants however they choose;
2. Plaintiffs may have 40 pages collectively for their oppositions to Defendants' motions to be allocated among Plaintiffs however they choose;
3. Defendants may have 24 pages collectively for their replies to be allocated among Defendants however they choose.

IT IS SO STIPULATED.

Dated: September 9, 2020

Respectfully submitted,

By: /s/ A. Matthew Ashley

A. Matthew Ashley  
Counsel for Defendants  
FORTRESS INVESTMENT GROUP  
LLC, FORTRESS CREDIT CO. LLC,  
VLSI TECHNOLOGY LLC

/s/ Christopher A. Seidl

Christopher A. Seidl (*pro hac vice*)  
CSeidl@RobinsKaplan.com  
ROBINS KAPLAN LLP  
800 LaSalle Avenue, Suite 2800  
Minneapolis, MN 55402  
Telephone: 612 349 8468  
Facsimile: 612 339-4181  
Counsel for Defendants  
INVT SPE LLC  
INVENTERGY GLOBAL, INC.

/s/ Jason D. Cassady

Jason D. Cassady (*pro hac vice*)  
jcassady@caldwellcc.com  
CALDWELL CASSADY & CURRY  
2121 N. Pearl Street, Suite 1200  
Dallas, TX 75201  
Telephone: 214 888-4841  
Facsimile: 214-888-4849  
Counsel for Defendant  
IXI IP, LLC

/s/ James J. Foster

James J. Foster  
jfoster@princelobel.com  
PRINCE LOBEL TYE LLP

By: /s/ Mark D. Selwyn

Mark D. Selwyn (SBN 244180)  
mark.selwyn@wilmerhale.com  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
2600 El Camino Real, Suite 400  
Palo Alto, CA 94306  
Telephone: +1 650 858 6000  
Facsimile: +1 650 858 6100

William F. Lee (*pro hac vice*)  
william.lee@wilmerhale.com  
Joseph J. Mueller (*pro hac vice*)  
joseph.mueller@wilmerhale.com  
Timothy Syrett (*pro hac vice*)  
timothy.syrett@wilmerhale.com  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
Telephone: +1 617 526 6000  
Facsimile: +1 617 526 5000

Leon B. Greenfield (*pro hac vice*)  
leon.greenfield@wilmerhale.com  
Amanda L. Major (*pro hac vice*)  
amanda.major@wilmerhale.com  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, N.W.  
Washington, DC 20006  
Telephone: +1 202 663 6000  
Facsimile: +1 202 663 6363

*Attorneys for Plaintiffs*  
INTEL CORPORATION and APPLE INC.

1 One International Place, Suite 3700  
2 Boston, MA 02110  
3 Telephone: 617 456-8022  
4 Facsimile: 617 456-8100  
5 *Counsel for Defendant*  
6 UNILOC 2017 LLC

7 /s/ Daniel. R. Shulman  
8 Daniel R. Shulman (*pro hac vice*)  
9 dan@shulmanbuske.com  
10 SHULMAN & BUSKE PLLC  
11 126 North Third Street, Suite 402  
12 Minneapolis, MN 55401  
13 Telephone: 612 870 7410  
14 *Counsel for Defendants*  
15 UNILOC LUXEMBOURG S.A.R.L.  
16 UNILOC USA, INC

17 /s/ Dean C. Eyler  
18 Dean C. Eyler (*pro hac vice*)  
19 dean.eyler@lathropgpm.com  
20 LATHROP GPM LLP  
21 500 IDS Center  
22 80 South 8th Street  
23 Minneapolis, MN 55402  
24 Telephone: 612 632-3335  
25 Facsimile: 612 632-4000  
26 *Counsel for Defendants*  
27 UNILOC LUXEMBOURG S.A.R.L.  
28 UNILOC USA, INC

/s/ Samuel F. Baxter  
Samuel F. Baxter (*pro hac vice*)  
sbaxter@mckoolsmith.com  
John Briody (*pro hac vice*)  
jbriody@mckoolsmith.com  
MCKOOL SMITH  
104 East Houston, Suite 100  
Marshall, TX 75670  
Telephone: 903 923-9001  
Facsimile: 903 923-9099

One Manhattan West  
395 9th Avenue, 50th Floor  
New York, NY 10001-8603  
Telephone: 212.402.9438  
*Counsel for Defendant*  
SEVEN NETWORKS, LLC

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**ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Edward M. Chen  
United States District Judge

**ECF ATTESTATION**

I, Olivia Lauren Weber, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER SETTING PAGE LIMITS FOR MOTION TO DISMISS AND STRIKE BRIEFING. I hereby attest that I received authorization to insert the signatures indicated by a conformed signature (/s/) within this e-filed document.

By: /s/ Olivia Lauren Weber  
Olivia Lauren Weber